



February 29, 2016  
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

**RE:   Buckeye Telesystem, Inc.  
      CPNI Certification for 2016  
      EB Docket No. 06-36; CY2015**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2015 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Buckeye Telesystem, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3001 or via email to [tforte@tminc.com](mailto:tforte@tminc.com). Thank you for your assistance in this matter.

Sincerely,

/s/ Thomas M. Forte

Thomas M. Forte  
Consultant to Buckeye Telesystem, Inc.

cc:    Brian Rex - Buckeye  
file:   Buckeye - FCC - Other  
tms:   FCx1601

Enclosures  
TF/mw

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

Annual 64.2009(e) CPNI Certification for 2015

Name of company(s) covered by this certification: Buckeye Telesystem, Inc.

Form 499 Filer ID: 817466

Name of signatory: Denton Parson

Title of signatory: Vice-President

I, Denton Parson, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement marked Exhibit A explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not to view the information).



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Denton Parson  
Vice-President  
Buckeye Telesystem, Inc.

2/29/2016

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Date

EXHIBIT A  
Buckeye Telesystem, Inc.

These policies and procedures, which are briefly summarized below, ensure compliance by limiting access to, use of, and disclosure of CPNI.

Only authorized personnel can access CPNI. All personnel so authorized, such as customer service representatives and billing and collection personnel, are trained in the appropriate access to, use of, and disclosure of CPNI. Failure to abide by the applicable policies and procedures is cause for discipline, up to and including termination.

The Company does not share CPNI among its affiliates other than in direct support of its business, unless prior customer approval has been obtained or no customer approval is needed. Further, the Company requires all independent contractors who have access to CPNI to enter an appropriate confidentiality agreement and to abide by applicable laws, regulations, policies, and procedures. The Company does not disclose CPNI to other third parties except as requested by the customer or as compelled or authorized by law.

The Company establishes a primary point or points of contact for CPNI at the customer's location when establishing a service account.

The Company notifies customers of their right to restrict access to, use of, and disclosure of their CPNI annually through bill inserts. The Company maintains records of all customer requests to opt-out of any communication or related disclosure for all communication other than in direct support of the Company's business.

All out-bound marketing campaigns that utilize CPNI are subject to managerial approval and to verification of customer approval to use CPNI in this manner. Records related to such efforts are maintained for at least one year.

Managerial personnel monitor access to, use of, and disclosure of CPNI on an on-going basis to ensure compliance with the applicable policies and procedures and to evaluate their effectiveness. The Company will report to the Commission instances, if any, in which opt-out mechanisms do not work properly.